

**IN THE UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF TEXAS
SAN ANTONIO DIVISION**

LA UNIÓN DEL PUEBLO ENTERO, et al.,
Plaintiffs,

v.

GREGORY W. ABBOTT, et al.,
Defendants.

5:21-cv-844-XR (Consolidated)

LULAC TEXAS, et al.,
Plaintiffs,

v.

JANE NELSON, et al.,
Defendants.

1:21-cv-0786-XR

LULAC PLAINTIFFS' DESIGNATION OF GENERAL ELECTION EXPERT

Pursuant to Federal Rule of Civil Procedure 26(a)(2); the Amended Scheduling Order (ECF No. 437); this Court's February 8, 2023 Order (ECF No. 518), and this Court's February 21, 2023 text order, Plaintiffs LULAC Texas, Voto Latino, Texas Alliance for Retired Americans, and Texas AFT ("LULAC Plaintiffs") submit the following disclosure of expert witnesses who have prepared a written report in compliance with Federal Rule of Civil Procedure 26(a)(2)(B) that LULAC Plaintiffs will serve upon all parties on March 6, 2023:

1. Dr. Kenneth R. Mayer, PhD.

Dr. Mayer is a Professor of Political Science at the University of Wisconsin-Madison. Dr. Mayer is expected to provide testimony regarding the burdens that Senate Bill 1 imposes on Texas voters, particularly racial and ethnic minorities. Dr. Mayer was retained by LULAC Plaintiffs to provide expert testimony and may be contacted through undersigned counsel.

LULAC Plaintiffs reserve the right to alter, amend, revise, or expand the opinions and expert witness subjects set forth above as necessitated by further discovery or changes in Defendants' expert witness disclosures. By this disclosure, LULAC Plaintiffs do not waive their right to challenge the admissibility of the testimony of any experts listed by Defendants in their disclosures.

Dated: March 6, 2023.

Respectfully submitted,

/s/ Uzoma N. Nkwonta

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